



## State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

Mr. Cristopher Anderson  
Director, Environmental Affairs  
L.E. Carpenter & Company  
200 Public Square  
Suite 36-5000  
Cleveland, OH 44114-2304

JAN 28 1998

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site  
Wharton, Morris County

On June 24, 1997 Roy F. Weston, Inc. (Weston) sent a letter to the New Jersey Department of Environmental Protection which proposed replacement, repair, and abandonment of several monitoring wells. Weston began this work prior to obtaining the Department's approval, and subsequently abandoned two monitoring wells (MW-11I and MW-11D) of which the Department did not approve. These wells would be useful to monitor the hydraulic conditions when recharge of treated ground water will occur. When this was told to Weston by telephone, the abandonment had already been completed. However, Weston stated that in the case of MW-11I, the well screen completely penetrated a clay layer, so the ground water samples from this well may not be representative of a specific zone, and in the case of MW-11D, the well screen was not set in a specific aquifer zone. Therefore, these wells were not serving their intended purpose and had to be abandoned.

It has come to the Department's attention that field work to delineate the MW-19 area will begin shortly. Since the well drilling equipment will be at the site, the Department is requesting that L.E. Carpenter install two new wells in the vicinity of where MW-11I and MW-11D were located during this field work event. One well should be screened in the intermediate zone and the other in the deep zone.

In addition, the Department has reviewed the Second Quarter 1997 Progress Report and has the following comments:

1. Section 1.4.1 - It is stated that ground water samples were collected in accordance with the protocols provided in the Department's "Field Sampling Procedures Manual" dated May 1992 and EPA's "Low Flow (Minimal Drawdown) Ground-Water Sampling Procedures" dated December 1995. The document further states the ground water samples were collected with a peristaltic pump upon completion of well purging.

The Department prohibits the use of peristaltic pumps to obtain ground water samples contaminated with volatile organic compounds. The use of this pump will strip off the volatile fraction, resulting in "non-detect"



or significantly reduced contaminant levels leading to erroneous conclusions concerning the extent of ground water contamination. Please refer to pages 173 and 177 of "Field Sampling Procedures Manual" where the use of peristaltic and other suction lift pumps for sampling ground water contaminated with volatile organic compounds is discussed. Accordingly, the Department requires that L.E. Carpenter adhere to the Department's requirements for collecting ground water samples. Should future sampling events not follow the correct procedures, the data will be rejected.

2. The ditch has not been sampled, which was proposed in the Aquifer Testing Protocol. This sampling must occur, since it was approved by the Department, or justification provided otherwise.

Please feel free to contact me at (609) 633-7261 if you have any questions.

Sincerely,



Gwen Barunas, P.E.  
Case Manager  
Bureau of Federal Case Management

c: Stephen Cipot, USEPA  
George Blyskun, BGWPA  
John Prendergast, BEERA